

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L.
Madoff Investment Securities LLC and the Chapter
7 Estate of Bernard L. Madoff,

Plaintiff,

v.

RUSSELL OASIS,

Defendant.

Adv. Pro. No. 23-01181 (CGM)

STIPULATION AND ORDER REGARDING WAIVER OF SERVICE

Irving H. Picard (the “Trustee”), as trustee for the substantively consolidated SIPA liquidation of Bernard L. Madoff Investment Securities LLC, under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–III, and the chapter 7 estate of Bernard L. Madoff, and

defendant Russell Oasis (the “Defendant,” and, together with the Trustee, the “Parties”), by and through their respective undersigned counsel, hereby stipulate and agree as follows:

WHEREAS, on September 20, 2023, the Trustee commenced the above-captioned adversary proceeding against Defendant (the “Action”) to recover subsequent transfers allegedly received from RAR Entrepreneurial Fund, Ltd., *see* Complaint, *Picard v. Oasis*, Adv. Pro. No. 23-01181 (Bankr. S.D.N.Y. Sept. 20, 2023), ECF No. 1 (the “Complaint”); and

WHEREAS, Defendant is represented by Brett Marks, Esq. of Akerman LLP concerning this matter and is authorized by Defendant to accept service of process of this lawsuit on his behalf.

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned, that:

1. Defendant accepted service of the Trustee’s Complaint and summons, which were transmitted electronically to undersigned counsel.
2. Defendant will answer, move, or otherwise respond to the Trustee’s Complaint on or before November 27, 2023.
3. The Parties in this Action reserve all rights, claims, arguments, objections, and defenses they may have and, except as specifically provided herein, nothing referenced in this Stipulation shall impair, constitute a waiver of, or otherwise affect any such rights, claims, arguments, objections, and defenses.

Dated: October 23, 2023
New York, New York

By: /s/ Brian Song

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*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities
LLC and the Chapter 7 Estate of Bernard L.
Madoff*

By: /s/ Brett Marks

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*Attorneys for Defendant
Russell Oasis*

SO ORDERED.

**Dated: October 24, 2023
Poughkeepsie, New York**



/s/ Cecelia G. Morris

**Hon. Cecelia G. Morris
U.S. Bankruptcy Judge**